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January 12, 2016

VIA ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Dickerson et al. v. Novartis Corporation and Alcon Laboratories, Inc.
Civil No. 1:15-CV-01980-GHW

Dear Judge Woods:

Plaintiffs respectfully submit this letter and its attached exhibits in response to this Court's Order dated December 30, 2015 (Dkt. No. 46). That Order directed plaintiffs to submit additional information regarding:

1. A copy of the plaintiffs' expert report, or a detailed affidavit setting forth the report's conclusions and the methodology employed to reach those conclusions;
2. The pay and benefit structure, including the range of compensation, for each of the positions described in the four proposed classes;
3. The criteria used by plaintiffs to select the third-party neutral;
4. The instructions provided to the third-party neutral regarding the allocation of settlement funds;
5. The third-party neutral's basis for the proposed allocation of the settlement fund between "Base Payments" and "Supplemental Payments;" and
6. The third-party neutral's basis for the proposed allocation of the settlement fund between the four proposed classes.

Additionally, the Order directed plaintiffs to submit the right to sue letters identified in the amended complaint.

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The Representative Plaintiffs provide additional information regarding item (1) in Exhibit A hereto, which is a declaration from Plaintiffs' expert, Alexander Vekker, Ph.D.

The Representative Plaintiffs provide additional information regarding items (2)-(3) in Exhibit B hereto, which is a declaration from David Sanford, who is lead counsel in this action.

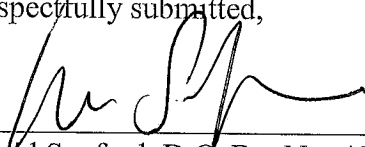
The Representative Plaintiffs provide additional information regarding items (4)-(6) in Exhibit C hereto, which is a declaration from the third-party neutral, Carol Wittenberg.

Plaintiffs submit the right to sue letters identified in the amended complaint in Exhibit D hereto.

The Representative Plaintiffs provide additional information regarding points of law raised by the Court in its Order dated December 30, 2015, in Exhibit E hereto, which is a supplemental memorandum of law addressing those points.

Finally, the Representative Plaintiffs and Defendants have simultaneously filed a Joint Application for Leave to File Redacted Documents, which seeks leave of court to file redacted versions of the Vekker, Sanford, and Wittenberg declarations.

Respectfully submitted,



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